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19                   MR. LUDLOW:   I'm Grant Ludlow.   I'm a chemical  
20     SEP 30 1999   engineer.   I have a nuclear engineering training and  
21     experience.

22                   I want to state at the outset that my remarks are  
23     not critical of -- of DOE or anybody else involved in this  
24     project.

25                   As an engineer, I like to know what the problem

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1 is before I try to solve it, and the EIS has some deficiencies  
2 that cover up the underlying problems.

1 3 [The main deficiency is that it's understood by  
4 the public that the DOE is putting out this EIS, and that's not  
5 true.

6 The DOE does not have anybody with technical  
7 confidence to put on paper what the -- what is in that EIS.  
8 They don't have anybody that is capable of understanding the  
9 problem. They don't have anybody that you can even explain  
10 what the problem is to. That's not their function.

11 That function falls to the contractors, and I'll  
12 give you an example of the level of confidence of the  
13 contractors.]

2... 14 [TRW just finally admitted that they used this dry  
15 cask scenario that everybody's been talking about to build it  
16 out of six inch thick stainless steel, and they finally  
17 admitted that it cracked open.

18 The reason they admitted it cracked open because  
19 whether they very foolishly tried to bolt it shut, the thing  
20 exploded. It had hydrogen gas in there.

21 When you talk to -- when I talked to the TRW  
22 people and I said, "Hey, what is this? You guys are supposed  
23 to be the technical experts on this job," and what they said  
24 was "well, we can't be a technical expert because DOE doesn't  
25 have anybody understanding -- that can understand what we're

1 doing, and so every time we try to do something, we get an  
2 argument, so we just give up and take the paycheck and go."

...2

3 That's a fatal flaw through this whole project  
4 and that needs to be in the EIS.

5 I got a similar answer from Bechtel. I haven't  
6 talked to PAI yet, but maybe -- I understand they have some  
7 sharp people there. I'll find out.

8 Another example of the problems that we have is  
9 this cask that split open violates the Nelson limits.

10 The Nelson limits -- I've asked for months from  
11 the DOE and Yucca Mountain to tell me what they are, and they  
12 can't find it.

13 NRC doesn't have anybody that can find them. The  
14 National Academy of Science doesn't have anybody that can find  
15 them, and this kind of thing needs to be addressed in the EIS  
16 that we have fatal flaws in the -- in the whole system and  
17 under the NEPA laws, that's required to be in there up front  
18 for the public.

19 The people that use the Nelson limits that by the  
20 way predicted this cask would crack in two to six months, so  
21 they failed their -- either they covered it up for the last  
22 four and a half years or the Nelson limits failed. The thing  
23 supposedly lasted five years before it split open.

24 The people that know about these Nelson limits  
25 are industrial engineers, chemical engineers, mechanical

1 engineers, people that work in industry, and that's only about  
2 a third of the engineers in the country.

...2

3 Two-thirds work for the government and for  
4 government contractors, so you won't find anybody in your  
5 contractors, you won't find anybody in the government that even  
6 knows what I'm talking about.

7 That's a fatal flaw in this whole process, and it  
8 violates the NEPA laws because anything other than having  
9 somebody knows what they're doing is pure speculation, and that  
10 also needs to be mentioned in the -- in the EIS.]

11 Like I say, I'm not being critical. All I'm  
12 doing is pointing out that we have serious flaws that need to  
13 be addressed, and that's the purpose of this meeting.

14 The DOE also has behind it a lot of years of  
15 outstanding performance. I don't know whether DOE was around,  
16 but it was people of this kind of an organization that ended  
17 World War II with Japan and saved about a million casualties by  
18 developing the atomic bomb.

19 They also finally outspent Russia, and so won the  
20 Cold War, and although that isn't completely over yet, it's  
21 still a big feather in their cap, so these are not people that  
22 are flawed. This system is flawed.

23 The people that are working in this system don't  
24 understand what the flaws are, and that's the purpose of this  
25 meeting, to bring them up so we can address them and get them

**EIS000104**

1   straightened out.

2                   Thank you.

3                   MS. BOOTH:   Thank you.

4                   MR. BROWN:   Tom Bugo.